

FACILITY STATUS CHANGE FORM

Date Submitted:	Area: 200W	Control Number: D4-REDOX-030
Originator: Daniel Turlington	Facility ID: 2710S	Phone: 509-373-0176

Action Memorandum/Removal Action Work Plan:

DOE/RL-2010-0033, Rev. 0

This form documents the status of facility decontamination, deactivation, decommissioning, and demolition operations or debris removal in accordance with the applicable regulatory decision documents.

Section 1: Facility Status

☒ All D4 operations required by action memo complete.

Description of Completed Activities and Current Conditions:

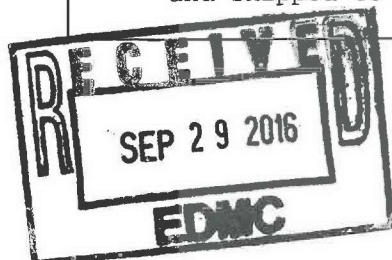
The required facility removal actions were performed in accordance with the DOE/RL-2010-33, Rev. 0, *Action Removal Action Work Plan for Central Plateau General Decommissioning Activities*.

2710S was constructed in 1952 in the 200W area south of REDOX. The building was used for inert gas generation (Attachment 1).

Demolition of 2710S was performed during September 2016. The facility was removed to slab on grade. Waste associated with this demolition was characterized under Waste Profile Number WC-PRCIF002 Rev. 4 and WPPRCIF001, Rev. 9, and disposed of at the Environmental Restoration Disposal Facility (ERDF).

The following actions were specifically implemented for 2710S:

- Hazardous substances, if present, were removed from within and around the structure. All hazardous substances removed were characterized and disposed in accordance with waste management Applicable or Relevant and Appropriate Requirements (ARARS) and receiving facility waste acceptance criteria.
- Beryllium sampling indicated no beryllium present, sample number 16-20092-001 to 006 (Attachment 2).
- All utility connections were severed at their sources with one exception. This connection was temporarily locked out and the conduit was cut at the 2710S building. The circuit associated with this line also controls systems needed after demolition. Therefore, an electrical box was built around this conduit to protect it from future disturbance.
- All slab penetrations are plugged.
- Historical preservation and ecological resource evaluations were performed in accordance with National Environmental Policy Act of 1969 requirements to address the impacts of demolition at the site. HCRC#88-200-038, letter #CHPRC-1601608 "Cultural and Ecological Review for the Demolition of Three REDOX Ancillary Facilities and Utility Isolation Outside the REDOX Fence Line" (Attachment 3).
- The 2710S structure is estimated to weigh approximately 35 tons.
- Asbestos on or in 2710S was treated as Asbestos Containing Material and shipped to ERDF for disposal.
- Radiation surveys RC-1601172 and RC-1601180 were performed on the remaining slab. No direct or removable contamination was found above background levels (Attachment 4).
- The structure 2710S was demolished to slab on grade using heavy equipment (e.g. excavators and track hoes). There are two concrete pedestals remaining as part of the slab that are above grade.
- All waste generated during demolition was characterized, shipped, and disposed of in accordance with waste management ARARS and WCH-191, *Environmental Restoration Disposal Facility Waste Acceptance Criteria*, as amended.
- Demolition debris from 2710S will be disposed of as Asbestos Containing Material and shipped to ERDF (Attachment 5).



FACILITY STATUS CHANGE FORM (continued)

Date Submitted:

Area: 200W

Control Number: D4-REDOX-030

Total Estimated Final Cost for the Facility:

\$630,500.00

Total estimated cost for this facility will be revised when actuals are available.

Section 2: Underlying Soil Status

- ☒ No waste site(s) present. No additional actions anticipated.
- ☐ Documented waste site(s) present. Cleanup and closeout to be addressed under a separate CERCLA Response Action.
- ☐ Potential waste site discovered during D4 operations. Waste site identification number <to be> assigned. Cleanup and closeout to be addressed under a separate CERCLA Response Action.

Description of Current/As-Left Conditions:

The 2710S was removed to slab on grade, including the two remaining concrete pedestals, no safety hazards remain. There is one electrical box remaining that was not severed at the source. The line associated with this box was locked out and cut at the 2710S facility. All other connections were severed at the building entry point. Two UICs are left in place adjacent to the slab and have been identified by GPS.

Identification of Documented Waste Site(s) or Nature of Potential Waste Site Discovery (as applicable):

N/A

Section 3: List of Attachments

Attachment 1 2710S pictures:

- 1-Pre Demolition
- 2-During Demolition
- 3-Post Demolition

Attachment 2 Beryllium Survey sample number 16-20092-001 to 006.

Attachment 3 Historical and Cultural review letter #CHPRC-16016068

Attachment 4 Rad Survey RC-1601172 and RC-1601180

Attachment 5 EPA Email Concurrence on Asbestos Management

DOE-RL

Print

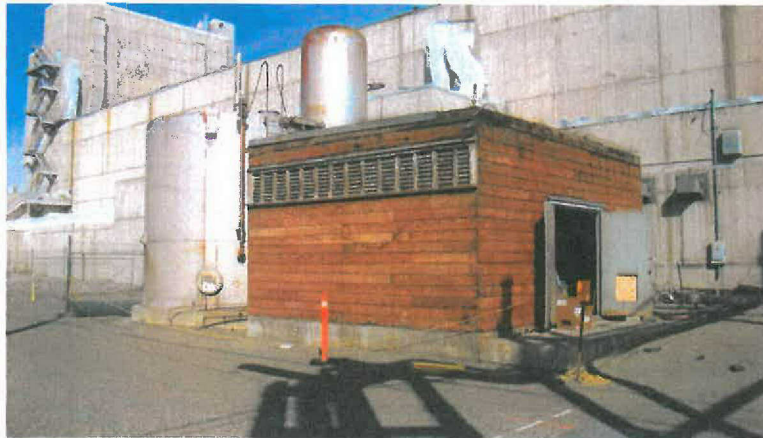
Signature

Date

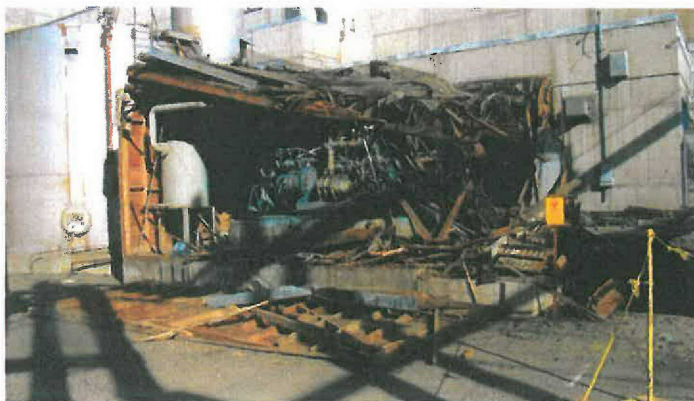
FACILITY STATUS CHANGE FORM (continued)		
Date Submitted:	Area: 200W	Control Number: D4-REDOX-030



2710S Pre Demolition



2710S Pre Demolition
CAB Removed



2710S During
Demolition



2710S During
Demolition



2710S Post Demolition

**Beryllium Verification Report For
2710S
2/11/2016**

Executive Summary

2710S is an inert gas generator building. Verification sampling was conducted on 2710S to confirm that it is beryllium cleared prior to demolition. Based on the sampling results, 2710S can be considered to be beryllium cleared.

Introduction

2710S is a 430 sq. foot storage building that was built in 1952. Verification sampling was conducted to confirm that it is beryllium cleared prior to being demolished.

Sample Strategy & Methodology

Sampling was conducted in accordance with DOE-0342-002. Due to its size, the building is considered to be a small survey unit. Based on its size and past usage, six samples were required by the sampling plan.

Deviations

None.

Results Summary

Results of the six samples (16-20092) were below trigger level. Two of the six wipe samples collected had readings of 0.045 ug/100cm² (16-20092-001) and 0.099 ug/100cm² (16-20092-003). All other wipe samples were reported at less than the detection limit of 0.025 ug/100cm².


Conclusions/Recommendations

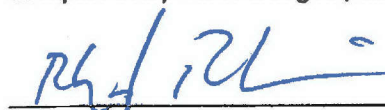
The sample results support a conclusion that the building can be considered beryllium cleared.

References

None.

Signatures

 2-11-2016
Completed By: Patrick Sagdal, CHST

 11 Feb 2016
Reviewed By: Roby Robinson, CIH

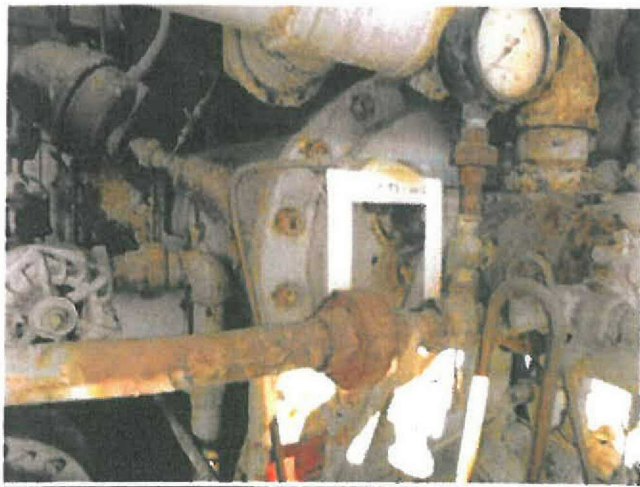
Attachments

1. Sample Location Photos
2. Beryllium Verification Sampling Plan
3. Summary of Data

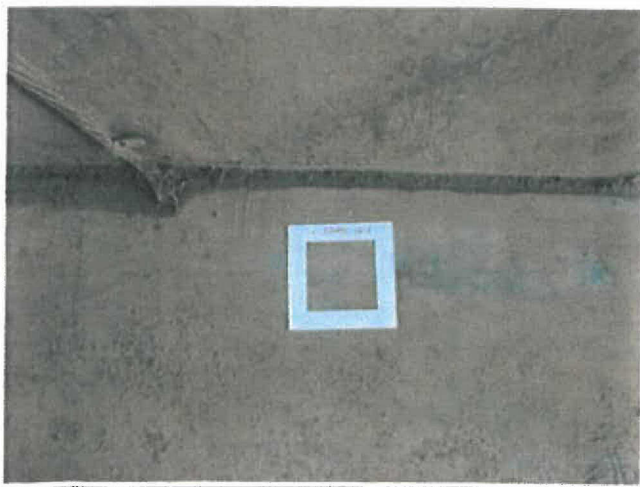
Attachment 1



16-20092-001



16-20095-002



16-20092-003



16-20092-004



16-20092-005



16-20092-006

BERYLLIUM CHARACTERIZATION/VERIFICATION SAMPLING PLAN	
Job Information:	
a) Title:	Beryllium Characterization/Verification Sampling of 2710S
b) Location:	200W
c) Purpose:	<input type="checkbox"/> Complete Characterization <input type="checkbox"/> Partial Characterization <input checked="" type="checkbox"/> Verification Sampling
Identified Survey Units: 1 survey unit - Inert Gas Generator Building / Nitrogen Storage Building (410 ft ²)	

Survey Unit	Historical Sample Data	Identified Sample Locations ADD ROW	Required Number of Sample Points For Survey Unit
Inert Gas Generator Building	None	Inert Gas Generator (air activated valve bushing, copper alloy instrument sensing line near gauge), floor, random locations on 3 interior walls. See attached photos.	6

Personal Protective Equipment: Latex or nitrile gloves, safety glasses with side shields, substantial footwear. A FF-PAPR or PAPR Hood with HEPA/P100 cartridges shall be worn due to the presence of PACM in poor friable condition within the building.
Work Practices: Building Administrator contact information - Darin Corriell /509.376-1743/509.438-7819 (cell) Building Specific Hazards and Controls (lighting, support personnel needs, etc.) - No lighting is present in the building. portable lighting or flashlights shall be used for the sampling. - Biological hazards may be present due to the condition of the building. Stop work and exit if deer mice, snakes, or other pests are present.

Beryllium Characterization/Verification Sampling Plan

BERYLLIUM CHARACTERIZATION/VERIFICATION SAMPLING PLAN

- TSI is present in the building on process piping. Exterior siding is ACM. Do not sample, contact or disturb these surfaces.

Prior to sampling conduct a Pre-Job Briefing. Review:

- Emergency Response actions
- General Hazard Analysis
- PPE and Work Practices Section of Sampling Plan
- Incipient hazards such as weather
- Injury/Accident reporting
- NO SMOKING in or near the building
- Radcon shall survey the surfaces and/or those adjacent to determine if the samples are radiological contaminated.

Other:

- Ensure that the Building Administrator authorizes the sampling evolution to occur and releases work.
- Sampling must be conducted by an IHT.

Sample Analysis:

- ☒ Beryllium is only analyte
- ☐ Other metals required with beryllium (list metals):

N/A

☐ Special analysis required (provide details):

N/A

Comments/Deviations

N/A

Prepared By: <u>VFW KOGAN</u>	<u>[Signature]</u>	1/28/16
Print Name	Signature	Date
Approved By: <u>ROY J. RABINOW</u>	<u>[Signature]</u>	28 JANUARY 2016
Print Name	Signature	Date

Attachment 3

Sample Data Tables/Summary of Data

Table 1. 2710S Beryllium Surface Sample Analytical Results

Sample Number	Sample Date	Sample Result ($\mu\text{g}/100\text{ cm}^2$)	Control Level ($\mu\text{g}/100\text{ cm}^2$)	Sample Location
16-20092-001	01/20/2016	0.045	0.2	Foxboro air activated valve.
16-20092-002	01/20/2016	<0.025	0.2	Copper instrument sensing line.
16-20092-003	01/20/2016	0.099	0.2	Middle of floor.
16-20092-004	01/20/2016	<0.025	0.2	North Wall.
16-20092-005	01/20/2016	<0.025	0.2	West Wall.
16-20092-006	01/20/2016	<0.025	0.2	South Wall.

INTEROFFICE MEMORANDUM

CHPRC-1601608

Date: April 12, 2016

To: D. R. Corriell, Director, Central Plateau Surveillance & Maintenance
E. A. Prichard, Project Manager, Decommissioning & Remediation Project

From: L. M. Dittmer, Subject Matter Expert, NEPA/SEPA/Cultural/Ecological
D. R. Turlington, Environmental Compliance Officer, Central Plateau Surveillance & Maintenance *md 4/12/16
let 4/12/16*

Subject: CULTURAL AND ECOLOGICAL REVIEW FOR THE DEMOLITION OF
THREE REDOX ANCILLARY FACILITIES AND UTILITY ISOLATION
OUTSIDE THE REDOX FENCE LINE

Reference: Letter, A. L. Johnson, MSA, to L. M. Dittmer, CHPRC, "Ecological and Cultural Clearance for Confirmation Sampling of the LLBG FS-1 Outdoor Container Storage Area, 200 West Area, Hanford Site, (HCRC#88-200-038, ECR-2015-243), MSA-1501895/CHPRC, dated April 28, 2015.

The scope of this project includes demolition and removal of three small support buildings near the REDOX facility. These buildings are in a highly disturbed area, and all work will take place above grade with the exception of minor excavation for utility isolation at 2718-S, and possibly also at 2710-S. It will not expand beyond the original excavation that was completed to install the utility lines. These are shallow, small diameter lines that will require minimal excavation to locate and isolate. Due to the highly disturbed nature of this area, the subsurface that will be excavated consists of fill material from the original installation of the utility lines. Therefore, cultural artifacts or items of historical interest are not expected in this location. Any unexpected items that might be discovered would have been placed in this location during the backfill following installation of the water line; hence, workers shall be instructed to be aware of this potential during the excavation.

This memorandum documents a review for compliance with Plateau Remediation Contract requirements for the following:

- The ecological resources evaluation conducted by the Environmental Compliance Officer (ECO);
- Provides the required instructions to staff who will be performing the work, for awareness of the need to protect cultural/historic artifacts and migratory birds, as well as the required response should these items be identified during the performance of the project; and
- Documentation that the scope of the action is covered by reviews that have been completed under Section 106 of the National Historic Preservation Act of 1966, As Amended (Section 106) to satisfy the cultural resource review requirement.

D. R. Corriell
Page 2
April 12, 2016

This conclusion is consistent with the Ecological and Cultural Clearance for Sampling at the LLBG FS-1 Storage Area in 200 West (reference).

Cultural Evaluation

The cultural review number for this is HCRC #88-200-038, based on the following:

In 1990, a Cultural Resources Review was conducted for Hanford Site operations and cleanup activities within the 200 East and 200 West Areas. The Archaeological Survey of the 200 East and 200 West Areas, Hanford Site, Washington (HCRC#88-200-038) considered potential impacts to historic properties from Hanford operations within the 200 Areas (Chatters and Cadoret 1990). The finding reached is that no historic properties would be impacted as a result of on-going operations and cleanup within the 200 West Area, with the exception of the old White Bluffs Road that crosses the northwest corner, and that no additional Section 106 reviews are necessary to maintain this finding (Chatters and Cadoret 1990). Because Section 106 requirements have been previously met, no additional review of the project is required.

There is no evidence in this area of historic use/occupation, or areas of cultural importance on or near the site. Extensive disturbance of this area during the installation of water lines and other utilities, as well as nearby structures, has left no material evidence of a historic nature that could be observed at the work site.

DOE/RL-96-77, *Programmatic Agreement Among the U.S. Department of Energy, Richland Operations Office, the Advisory Council on Historic Preservation, and the Washington State Historic Preservation Office for the Maintenance, Deactivation, Alteration, and Demolition of the Built Environment on the Hanford Site, Washington* (PA), addresses the built environment constructed during the Manhattan Project and Cold War Era periods of Hanford's operational history, encompassing the years 1943 through 1990. The PA directed that a Sitewide Treatment Plan be developed to identify, inventory, and evaluate all undertakings which may affect historic buildings and structures on the Hanford Site, and identifies those that require mitigation measures to preserve historic, architectural, and technological values.

RL, in consult with the Advisory Council on Historic Preservation and the State Historic Preservation Office (SHPO), developed DOE/RL-97-56, *Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan* (Sitewide Treatment Plan) to preserve the history of the site. The Sitewide Treatment Plan lists representative buildings and structures that require mitigation (identification, removal, preservation of historically significant artifacts). The Sitewide Treatment Plan only covers the historic preservation procedures for the buildings/structures themselves, and 2710-S, 2711-S, and 2718-S are on the *Non Contributing/Exempt Properties* list. Therefore, these buildings are not included in the Sitewide Treatment Plan as a candidate for mitigation. The PA stipulates, in Section IV.F.; "For those properties for which no mitigation is required under the Sitewide Treatment Plan, RL and SHPO agree that no further communication or notification is necessary."

D. R. Corriell

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Prior to initiation of this project, all project staff will be trained to be aware of potential cultural or historical artifacts that may be encountered, and the following language will be included in the project work package:

If any cultural materials, including but not limited to stone tools, flakes, bones, shells, bottles, subsurface foundations, are discovered during the demolition of 2710-S, 2718-S, or 2711-S and associated utility isolation, work in the vicinity of the discovery shall cease, and workers will contact the project ECO. The ECO will contact a cultural resource professional (e.g., archaeologist, historian), who will assess the significance of the find, and if necessary, arrange for the mitigation of the find.

Any required mitigation will take place in accordance with the Sitewide Treatment Plan and stipulation IV.D of the Programmatic Agreement.

This clearance was discussed with Ray Swenson and Rick Engelmann, and they agree that it is appropriate to use HCRC#88-200-038 as the cultural clearance for this work.

Ecological Resources Evaluation - 2710S Inert Gas Generator, 2711S Stack Gas Monitoring Building and the 2718S Sand Filter Sample Building Work Location

CHPRC Environmental Staff performed a pedestrian survey of the 200W REDOX Ancillary work Location 1, on 11/30/15 and again on 2/18/16. The area consists of a severely disturbed location that has been excavated and backfilled with construction grade fill/gravel. The location lies immediately adjacent and within the footprint of the 202-S REDOX Canyon Facility. There is significant and complete disturbance of soils as result of the original construction of the 202-S structure and numerous support facilities such as foundations for ancillary buildings and tank farms.

Regular and periodic maintenance of this industrial setting has included vegetation control via herbicide application by MSA. Therefore, the entire Area of Concern is void of vegetation.

No plant or animal species protected under the Endangered Species Act, candidates for such protection, or species listed by the Washington State government as threatened or endangered were observed in the vicinity of the proposed project site (see attached photos).

There is always the potential for birds to nest within the project area on the ground, on buildings, or equipment. The nesting season on the Hanford site is typically from mid-March to mid-July. Active nests (containing eggs or young) of migratory birds are protected by the Migratory Bird Treaty Act (MBTA) of 1918. The MBTA makes it illegal for people to "take" migratory birds, their eggs, feathers, or nests. Take is defined in the MBTA to include by any means or in any manner, any attempt at hunting, pursuing, wounding, killing, possessing, or transporting any migratory bird, nest, egg, or part thereof. Prior to initiation of this project, all project staff will be trained, and the following language will be included in the project work package:

D. R. Coriell

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CHPRC-1601608

Personnel working on this project must watch for nesting birds. If any nesting birds (if not a nest, a pair of birds of the same species or a single bird that will not leave the area when disturbed) are encountered or suspected, or bird defensive behaviors (flying at workers, refusal to leave area, strident vocalizations) are observed within the project area, pause work and contact the project ECO to evaluate the situation.

A site walkdown performed by an ECO is required immediately prior to the commencement of D4 activities for a final evaluation of the work site for environmental concerns.

No adverse impacts are anticipated from the proposed project if these recommendations are followed.

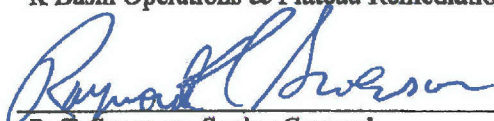
Provided as an attachment to this memorandum is a schematic of the three buildings to be demolished, including the locations of the utility isolations, as well as three photos, 1) 2710S Inert Gas Generator, 2) 2711S Stack Gas Monitoring Building, 3) 2718S Sand Filter Sample Building.


R. H. Engelmann, Manager
Technical Services, Environmental Protection
Environmental Program & Strategic Planning

4/12/2016
Date


B. J. Dixon, Director
Environmental Compliance
K Basin Operations & Plateau Remediation

4/12/2016
Date

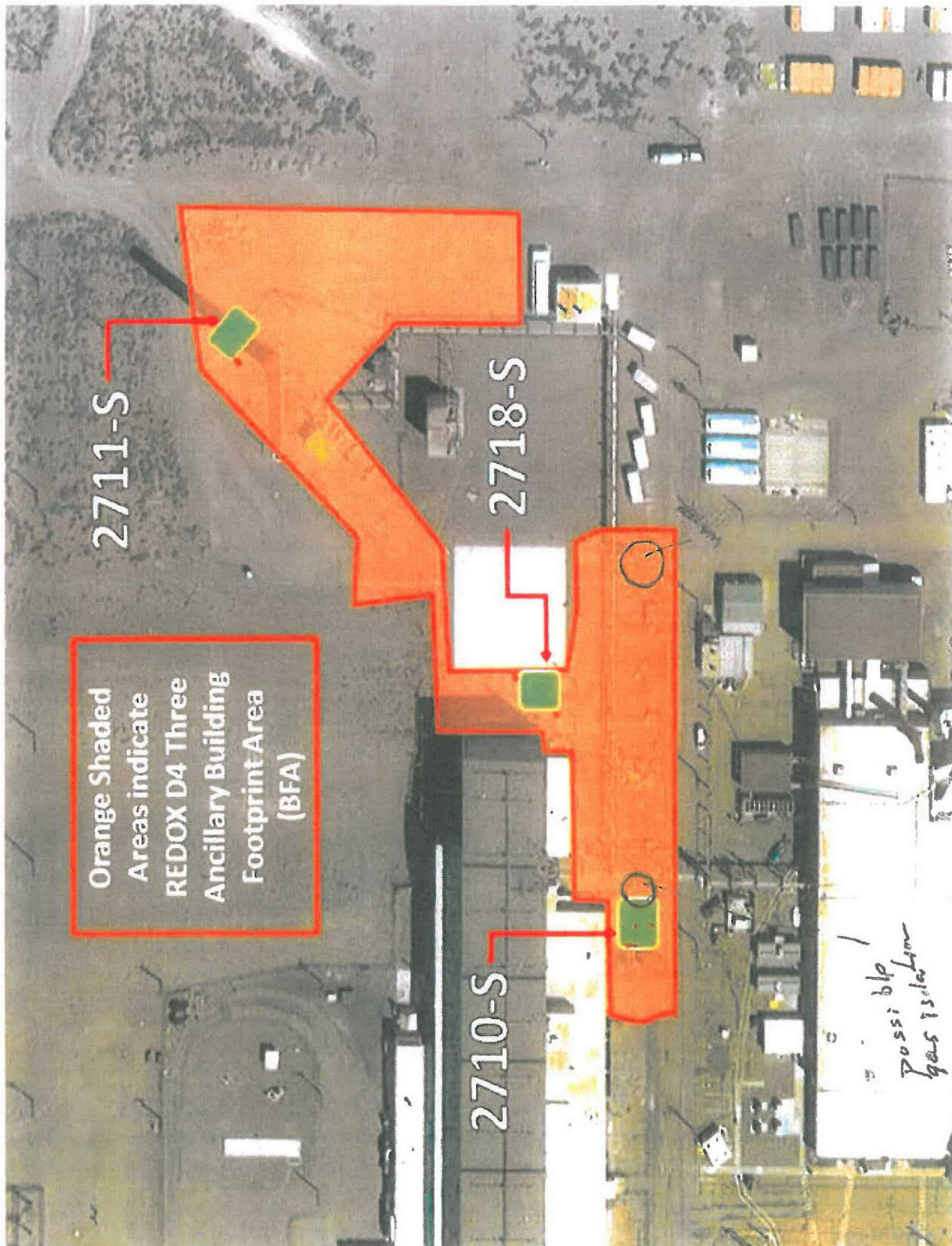

R. T. Swenson, Senior Counsel
General Counsel

4/12/2016
Date

lmd/drt/sb

Attachment

cc: CHPRC Correspondence Control, G3-39
L. J. Cusack, H8-45
B. H. Dixon, X4-01
R. H. Engelmann, H8-45
R. E. Fox, T4-09
M. N. Jaraysi, H8-43
R. T. Swenson, H8-66
E. D. Trotta, H8-66

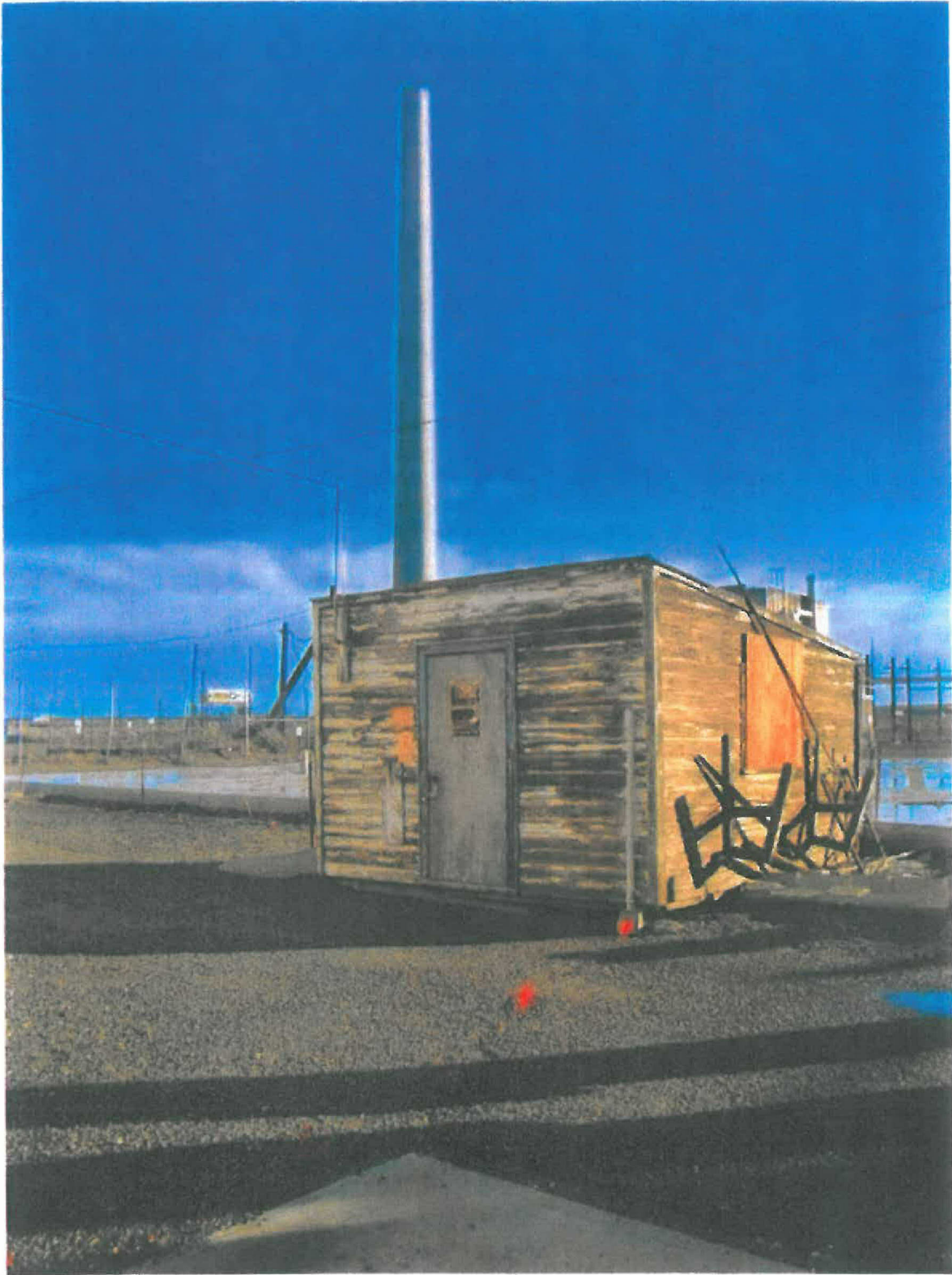


REDOX D4 - THREE ANCILLIARY BUILDING FOOTPRINT AREA

CHPRC-1601608
ATTACHMENT

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CHPRC-1601608
ATTACHMENT



2718S Sand Filter Sample Building

CHPRC-1601608
ATTACHMENT

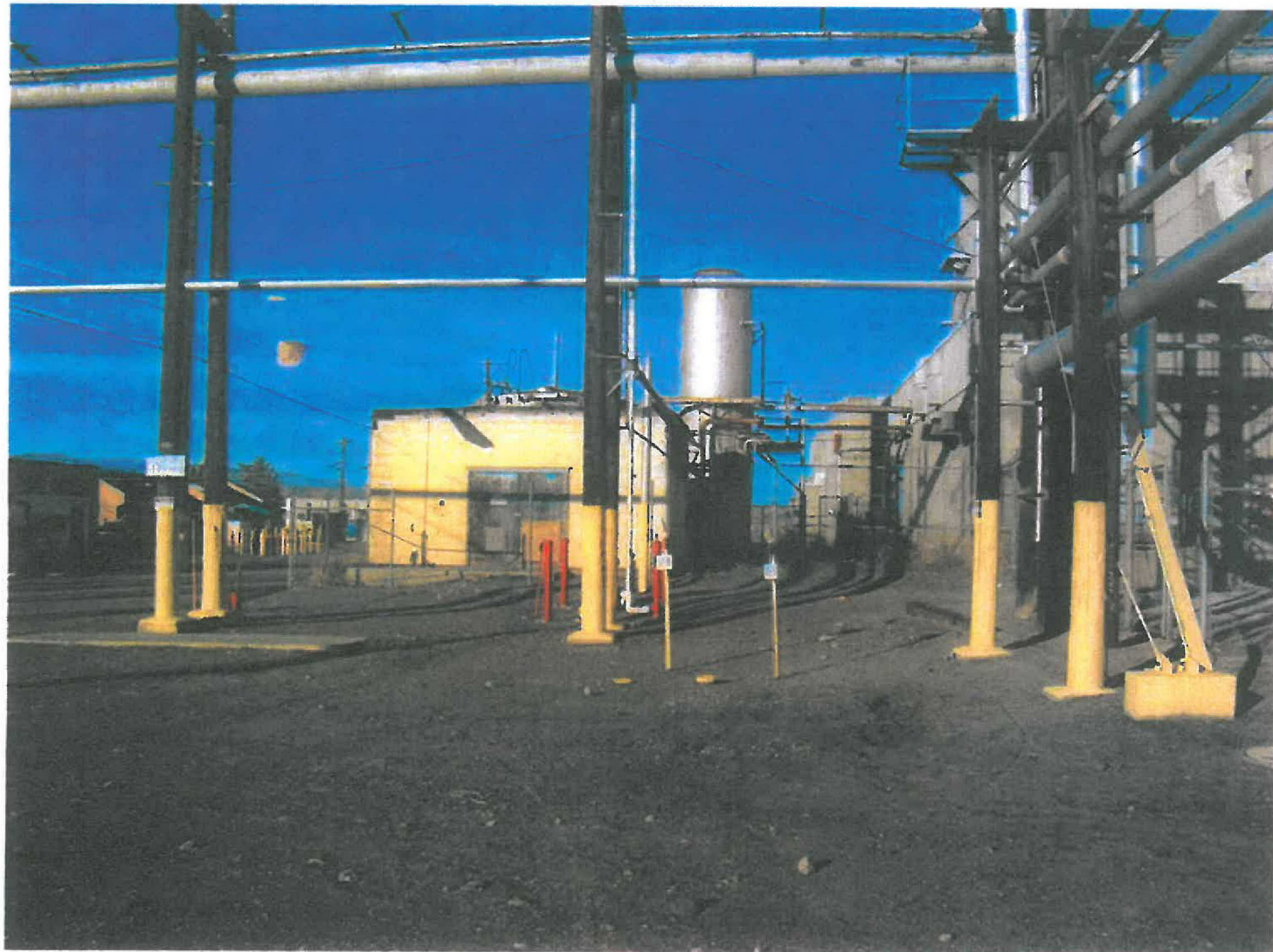
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CHPRC-1601608
ATTACHMENT



2711S Stack Gas Monitoring Building

CHPRC-1601608
ATTACHMENT



2710S Inert Gas Generator

CH2M HILL PLATEAU REMEDIATION COMPANY			RSR No.	Page 1 of 8
RADIOLOGICAL SURVEY REPORT(Submitted for Approval)			RC-1601172	
Date 09/24/2016	Start/Stop Time 0700/1030	Area/Location 200W / 2710S / outside		RWP/Rev. N/A
Purpose of Survey: <input type="checkbox"/> Material Clearance Number: N/A Cleared to: N/A <input type="checkbox"/> Ram Shipment: N/A <input type="checkbox"/> Required Task: N/A <input checked="" type="checkbox"/> Job Coverage: CP-16-01147 <input type="checkbox"/> Verification survey $\alpha = <D$ <D=No increase in audible count rate N/A Inches/Sec. N/A Inches Away N/A Count Time (Sec.) N/A % Surveyed N/A # of Static Counts N/A Square Feet <input type="checkbox"/> Verification survey $\beta\gamma = <D$ <D=No increase in audible count rate N/A Inches/Sec. N/A Inches Away N/A Count Time (Sec.) N/A % Surveyed N/A # of Static Counts N/A Square Feet <input type="checkbox"/> Other: N/A		Description of Work: Total and removable contamination survey of concrete foundation footprint Comments: Performed 100% scan survey of concrete foundation. No readings over background levels were observed during scans. Performed direct static readings and technical smears approx. every 25 square ft, All readings were less than table 2-2 (CHPRC-00073) limits for total and removable surface contamination for Transuranics and Sr-90. An area approx. 1 ft x 5 ft on the north side of the foundation was not surveyed due to being posted "Danger-Lock and Tag required for entry" The foundation was swept to remove loose dirt and water was allowed to dry prior to performing surveys (after the pictures were taken).		

CH2M HILL PLATEAU REMEDIATION COMPANY RADIOLOGICAL SURVEY REPORT (Submitted for Approval)			RSR No. RC-1601180	Page 1 of 5
Date 09/26/2016	Start/Stop Time 1330/1430	Area/Location 200W / 2710S / SEE COMMENTS / 202S South side		RWP/Rev. N/A
Purpose of Survey: <input type="checkbox"/> Material Clearance Number: N/A Cleared to: N/A <input type="checkbox"/> Ram Shipment: N/A <input type="checkbox"/> Required Task: N/A <input type="checkbox"/> Job Coverage: N/A <input type="checkbox"/> Verification survey $\alpha = <D$ <D=No increase in audible count rate N/A Inches/Sec. N/A Inches Away N/A Count Time (Sec.) N/A % Surveyed N/A # of Static Counts N/A Square Feet <input type="checkbox"/> Verification survey $\beta\gamma = <D$ <D=No increase in audible count rate N/A Inches/Sec. N/A Inches Away N/A Count Time (Sec.) N/A % Surveyed N/A # of Static Counts N/A Square Feet <input checked="" type="checkbox"/> Other: Verification survey		Description of Work: Survey electrical terminations that were inaccessible previously during 2710S demo. Comments: Courtesy survey in area previously inaccessible due to demolition. South side 202S and east side of 2710S on building foot print post demolition. Less than table 2-2		

Date Submitted: 09/26/2016

A-6004-663-SS (Rev. 4)

Facility Status Change Form for 2710S
ATTACHMENT 4

CH2M HILL PLATEAU REMEDIATION COMPANY								RSR No.				Page 2 of 5			
RADIOLOGICAL SURVEY REPORT(Submitted for Approval)								RC-1601180							
Contamination Measurements															
* Manually Calculated by RCT															
		Background cpm		Direct Gross cpm/100 cm ²		Total dpm/100 cm ²		Correction Factor		Removable					
No.	Description	βγ	α	βγ	α	βγ	α	βγ	α	Type	Gross (cpm)		dpm/100 cm ²		
C1	Building concrete pad electrical terminations	250	1	300	2	500	10	10	10	Smear	267	0	170	<20	

Date Submitted: 09/26/2016

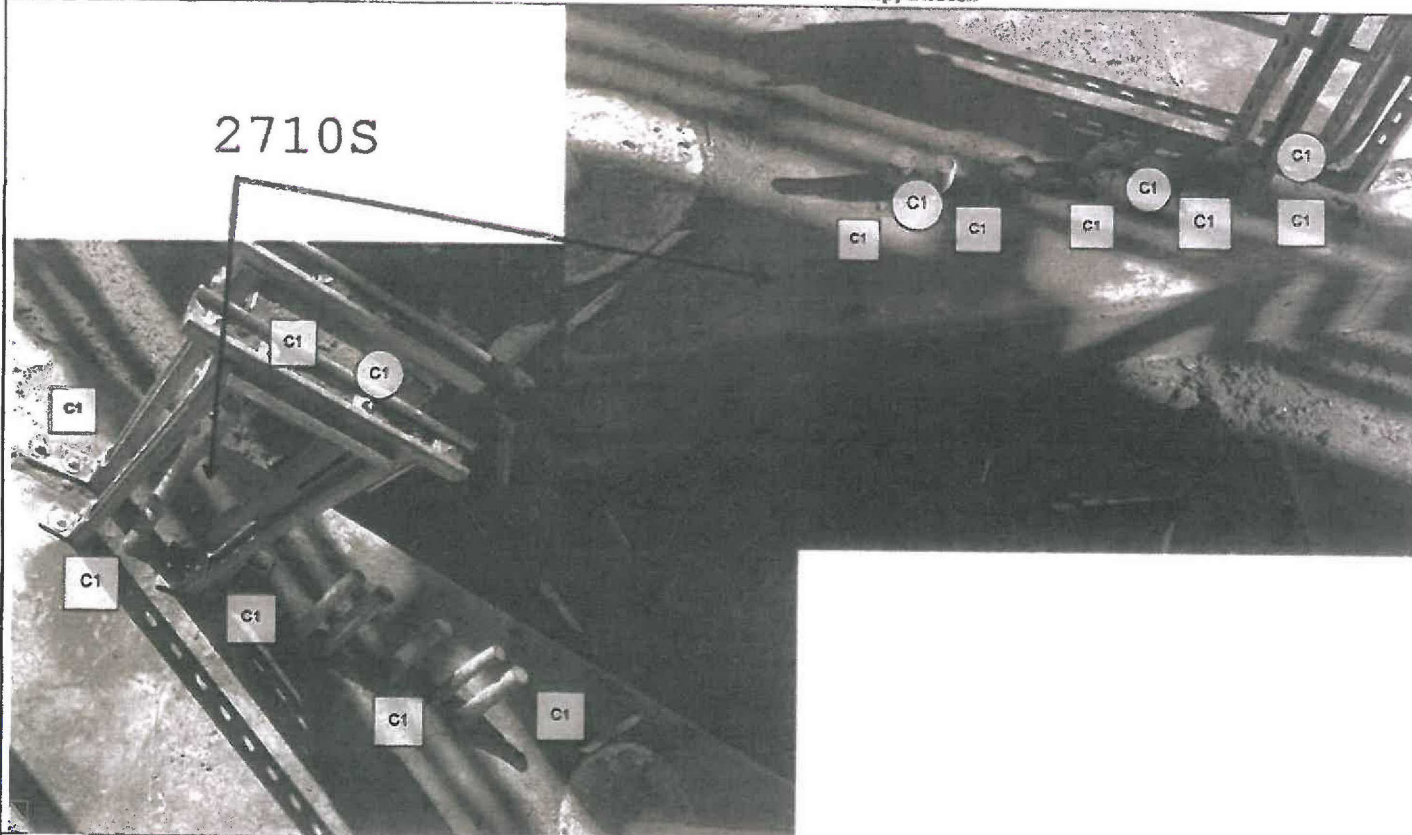
A-6004-663-SS (Rev. 4)

CH2M HILL PLATEAU REMEDIATION COMPANY
RADIOLOGICAL SURVEY REPORT (Submitted for Approval)

RSR No.
 RC-1601180

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Map/Sketch



Map Name: 200W

Map Description: 2710S Building pad

Legend	Direct Measurement	Air Sample	Smear	LAW	Neutron Dose Rate	Transferability	Field	Contact	Other Distance	Other Measurement
						T#	F#	C#	D#	O#
----- (designation inside) ----- Radiological Area Boundary						Note: Dose Rates in mrem/hr unless otherwise noted.				

Date Submitted: 09/26/2016

A-6004-663-SS (Rev. 4)

Facility Status Change Form for 2710S
 ATTACHMENT 4

**** Electronically Approved – RC-1601180 on 09/26/2016 ****

CH2M HILL PLATEAU REMEDIATION COMPANY		RSR No.		Page 4 of 5
RADIOLOGICAL SURVEY REPORT(Submitted for Approval)		RC-1601180		
Instruments				
Instrument Type	Bar Code No.	Probe Bar Code No.	Efficiency (Used)	Due Date
LUDLUM 2360 / 43-93	SCLL8-0431	DTLLP-0538	0.1	06/17/2017
Unless stated otherwise in the "Comments" section, contamination levels for C-14, Fe-55, Ni-59, Ni-63, Se-75, Tc-99, Pd-107, and Eu-155 are <= 10 times the b-g contamination levels shown above (see CHPRC-00073, Table 2-2).				
History				
9/26/2016 3:26:13 PM - Larson , Kenneth - Submitted:				
9/26/2016 3:59:00 PM - BIGGS , DANIEL - Final Approval:				

Date Submitted: 09/26/2016

A-6004-663-SS (Rev. 4)

Facility Status Change Form for 2710S
ATTACHMENT 4

**** Electronically Approved – RC-1601180 on 09/26/2016 **:**

User: Larson, Kenneth (h0106737)

Title: Owner

Date: Monday, September 26, 2016, 3:26 PM Pacific Standard Time

=====

User: BIGGS, DANIEL (h6820981)

Title: Reviewer

Date: 9/26/2016 3:59:00 PM Pacific Standard Time

=====

Ronfeld, Deborah M

From: Faulk, Dennis <Faulk.Dennis@epa.gov>
Sent: Thursday, September 15, 2016 4:35 PM
To: Toebe, Wayne E
Cc: Cameron, Craig (EPA); Prichard, Earl A; Turlington, Daniel R; Karschnia, Paul T; McKenney, Dale E; Faust, Eric T; Farabee, Oliver A (Al); Woolery, Wade C; Barry, Henry T; Dixon, Brian J; Collins, Michael S; Corriell, Darin R; Schwartz, Daren J; Fox, Charles R; Carleo, Frank J
Subject: Re: PLANNED DEMOLITION WITH CATEGORY I NONFRIABLE ACM IN PLACE

Wayne

The work practice described below is acceptable to EPA.

Dennis

Sent from my iPhone

On Sep 15, 2016, at 11:39 AM, Toebe, Wayne E <Wayne_E_Toebe@rl.gov> wrote:

Hello Dennis,

Please see summary information below regarding upcoming demolition work near REDOX at 2710S. We have identified a small amount of material through inspection that will be handled as Category I nonfriable ACM during the work.

At this time, we are requesting concurrence from EPA that the Category I nonfriable ACM will not be rendered friable by the planned demolition approach for the facility identified below. The demolition controls have been developed to ensure that Category I nonfriable ACM will not be rendered friable by the methods applied.

2710S: The building is a wood structure 12 feet tall covering approximately 430 ft² built in 1952. 2710S was used as an inert gas generating building. A minimal amount of potential Category I nonfriable ACM that is not in poor condition is present in piping flanges in 2710S. The total amount of ACM to be left in the building is approximately 5 ft². The project plans to leave this potential Category I nonfriable ACM in place at the commencement of demolition. Subsequently, the project intends to remove the piping for disposal as ACM without breaking the flanges.

The 2710S demolition activities and associated waste handling activities such as segregation, consolidation, and reduction will not include any sanding, grinding, cutting, or abrading of ACM. Water with surfactant will be used during the demolition and waste handling processes to keep dirt and dust down. Reduction of the building by the excavator will be minimized to the extent needed to load the material safely for transport. Fixatives will be used on asbestos-containing waste materials that remain overnight at the demolition site.

We would be glad to come to your office to discuss the planned building demolition and the associated Category I nonfriable ACM if you would like.

Thank you,

Wayne Toebe, CHPRC Environmental Protection
521-0333

**FROM EPA-340-1-92-013, DEMOLITION PRACTICES UNDER THE ASBESTOS
NESHAP:**

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